

# Federal Defenders OF NEW YORK, INC.

David E. Patton  
Executive Director  
and Attorney-in-Chief

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

## MEMO ENDORSED

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 02/24/2023

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

February 24, 2023

### By ECF

Hon. Valerie E. Caproni  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: United States v. Joakim Von Ditmar  
18 Cr. 863 (VEC)

Honorable Judge Caproni:

With the consent of the Government, I write on behalf of Mr. Von Ditmar to respectfully request that this Court order the U.S. Pretrial Services Department for the Southern District of New York to return Mr. Von Ditmar's passport to him, to his wife, Destinee Ross, or to a representative from my office. Mr. Von Ditmar surrendered his passport as a condition of pretrial release. He surrendered to the Bureau of Prisons on or about June 13, 2022, and, after completing the custodial term of his sentence, we understand that he has recently been transferred to ICE custody. Pretrial Services requires an order of this Court to return the passport.

I have discussed this request with Assistant United States Attorney Tara LaMorte, who consents on behalf of the United States.

Thank you for considering this request.

Sincerely,

/s/ Christopher A. Flood, Esq.  
Asst. Federal Defender  
Tel.: (212) 417-8734

Hon. Valerie E. Caproni  
United States District Judge

February 23, 2023  
Page 2

Re: **United States v. Joakim Von Ditmar**  
**18 Cr. 863 (VEC)**

Application GRANTED.

**SO ORDERED:**



02/24/2023

**Hon. Valerie E. Caproni**  
**U.S. District Judge**

CC: AUSA Tara LaMorte, Esq. (by ECF)